

EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DARAIUS DUBASH, and

DR. FARAZ HARSINI

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS;

HOUSTON DOWNTOWN PARK
CORPORATION;

OFFICER ROBERT DOUGLAS
(# 7943), in his individual capacity;

OFFICER VERN WHITWORTH
(# 7595), in his individual capacity;

DISCOVERY GREEN CONSERVANCY
f/k/a HOUSTON DOWNTOWN PARK
CONSERVANCY;

and

BARRY MANDEL, in his individual
capacity.

Defendants

CASE NO. 23-3556

DECLARATION OF FARAZ HARSINI

1. My name is Dr. Faraz Harsini. I certify that I am over 18 years of age and reside in Austin, Texas.

2. I came to the United States on a full scholarship and obtained my MSc in cancer research and my PhD in Cell Physiology and Molecular Biophysics, both from Texas Tech University.
3. After my doctorate, I turned down post-doctorate opportunities at MIT and Scripps because I wanted to conduct clinical research and save lives as effectively as possible. I therefore joined pharmaceutical companies to work on discovering new therapeutics for infectious diseases, pandemics, inflammatory diseases, and cancer.
4. I obtained my United States Permanent Residency via the National Interest category because of my scientific contributions to the United States. These contributions include my peer-reviewed scientific publications and discovery of new therapeutics for infectious diseases, particularly during the COVID-19 pandemic. I cherish all the rights afforded to me as a United States resident, including the right to free speech.
5. Throughout my research I found out that the root cause of many public health threats and environmental issues is traceable to our food system. Eighty percent of antibiotics in the United States are fed to animals, which directly contributes to the emergence of antibiotic resistance, one of the biggest threats to human life. A world with antibiotic resistance is a world of disease, suffering, and very low life expectancy. I spent years developing therapeutic monoclonal antibodies for diseases such as influenza. But the origin of many pandemics and zoonotic diseases is animal farming. In fact, according to the United Nations, the top three drivers of the next pandemic are directly linked to animal consumption and farming practices.
6. Animal consumption has been linked to major causes of death in the US, such as cardiovascular disease (the number one killer of Americans), cancer (the number two killer

of Americans), diabetes, obesity, and other chronic illnesses. Animal products contain substances like carcinogens, cholesterol, saturated fat, and endotoxins, which increase the risk of these diseases. In fact, every cancer society encourages us to reduce and remove meat from our diets. In contrast, my research and that of others shows a whole-food plant-based diet, free from animal products, can significantly reduce the risk of these diseases, prevent them, or in some cases reverse their progression. In my view, it saves lives.

7. In my research, I've found the data is compelling. The evidence demonstrates harmful effects of animal consumption on both human health and the environment. These detrimental impacts not only compromise our lives, but also burden our healthcare system and economy. The United States spends the highest proportion of GDP on health care in the world.
8. Unfortunately, there is a lack of widespread discussion surrounding these critical matters. As an educator and scientist, I strongly believe that it is my moral obligation to initiate conversations and raise awareness about these pressing issues.
9. The shocking reality of common and legal practices in animal agriculture deeply saddens me because it leads to death and destruction, not only for animals, but also for humans. Over the past decade of my work as an educator, I have witnessed that when people see the uncomfortable truth about animal treatment, they often change their perspective and no longer support such practices.
10. Despite the industry's use of images portraying happy animals on animal product packaging, my work has revealed to me that this is not the truth. In the face of attempts by animal industries to restrict public knowledge through ag-gag laws, I consider it my duty to expose the truth to those who want to be informed.

11. I am committed to promoting kindness and the well-being of humans, animals, and the environment, and therefore, it is my moral obligation to reveal the hidden reality of these unkind practices to people, who otherwise would want to make kind and compassionate choices. They deserve to be aware of the truth, as it is only through knowledge that they can make informed choices and take appropriate action.
12. When I realized that our food system was causing diseases, pandemics, and environmental problems, I switched my research to fix the food system using my scientific background by promoting a plant-based diet, and also through developing a new way to produce meat using cultivated meat (lab-grown meat), which has a much lower environmental impact and does not cause animal cruelty.
13. I also founded a national 501(c)(3) nonprofit, Allied Scholars for Animal Protection, through which my team brings education on the food system (environment, pandemics, public health, and animal cruelty) to top universities and medical schools in the US, including Harvard, MIT, Brown, Columbia, Texas A&M, and others. We have registered student organization chapters in multiple universities such as UT Austin and Texas A&M.
14. In addition to better educational opportunities, I immigrated to this country because, as a gay man and atheist living in Iran, I faced persecution including the possibility of death. I am thankful that this country grants me the right to speak freely on important issues.
15. In Iran, both homosexuality and apostasy are punishable by death. As if that weren't enough, I also participated in protests against the despotic Iranian regime, advocating for basic human rights and freedom of speech. I even advocated for Iranian and Israeli friendship.

16. In the 2009 presidential protests, I was followed and nearly killed by the Iranian Revolutionary Guard after they broke into my undergraduate university, the University of Tehran. I have burned enough bridges that I will never be able to go back to Iran, and I may never see my mother again.
17. I am very close to my mother. My parents are divorced, I'm the only child, and I haven't seen my mother since I left Iran about 10 years ago. This, in addition to the possibility of never seeing her again, has been a source of stress for both my mother and me. But that was a price we both accepted to pay, so that today I can enjoy the First Amendment right to speak freely and defend the voiceless, be it human or nonhuman animals, without a fear of censorship, discrimination, and punishment.
18. In a dark sense of humor, we have a saying in my country of origin, Iran: ما آزادی بیان داریم [“We have freedom of speech, but its extent depends on what you say!”]. While individuals are technically free to express themselves, there is no assurance that exercising this freedom won't lead to arrest or even execution. What happened to me at Discovery Green brought up some unpleasant memories from back in Iran.
19. I am a co-organizer of the Houston chapter of Anonymous for the Voiceless, an advocacy group that holds public educational demonstrations, known as “Cubes of Truth,” across the world to advocate for the fair treatment of animals.
20. Daraius Dubash is the other co-organizer of the Houston chapter of Anonymous for the Voiceless. Together, we have led numerous Cubes of Truth in public places throughout Texas such as Austin, Dallas, San Antonio, and Houston.

21. These educational actions include a few members holding small televisions strapped to their chests showing film clips of the poor treatment of animals all over the world, while the other members stand aside and wait to be approached by those passing by who are interested in our cause. The film clip has no audio. The members holding televisions wear a “Guy Fawkes mask” in the style popularized by the film *V for Vendetta*. In Anonymous for the Voiceless, we choose this white mask with a slight smirk for its meaning. The mask stands for thinking for yourself, protest generally, and change to the status quo and oppression. For me, it is a symbol for the fight for truth and justice, and that includes towards nonhuman animals. In my experience, the mask is critical to effectively communicate our message, because it grabs others’ attention without frightening them. Anonymous for the Voiceless uses the mask to identify themselves around the world. None of the volunteers who speak to the public wear masks. Instead, only Cube of Truth participants who hold the TVs wear the masks, so that people watch the video without being distracted by the face of the person holding the TV.
22. The Cube of Truth is a peaceful demonstration and members who participate in this protest do not approach or harass those passing by. As a leader, I have no desire to cause a disturbance and do not want to talk to people passing by if they have no interest in talking with me.
23. I do not allow members of our group to approach the members of the public unless those passing by come to us and voluntarily initiate the conversation with our members. They could do this by stopping and looking at the footage or by glancing at the footage and our volunteers multiple times. I do not allow members to engage children in conversation. I would remove a member who repeatedly violated protocol.

24. I want people to understand the reality of what happens when they consume animal products such as meat, fish, eggs, and dairy. We want to show the reality behind the scenes that has been intentionally kept hidden from consumers who have the right to know what they are supporting with their money. As a biomedical and food system senior scientist, I want to fix the food system that is hurting animals and people and costing our economy billions of dollars each year. We want a more compassionate and sustainable food system and we can't effectively create one when we are censored or discriminated against due to the content of our educational material.
25. As an educator, it is vital to incorporate footage of standard, lawful practices in animal industries into my teaching. While topics like antibiotic resistance, the current bird flu pandemic, and cancer are important, in my experience, it is often when people witness the reality behind the doors of animal industries that they are truly motivated to take action. I have found that it is only when I show the footage of the cramped living conditions of the animals that people understand why so many antibiotics are needed to keep those animals alive.
26. At each Cube of Truth, we play a silent video portraying images from the documentary film *Dominion*, which shows legal and standard practices in industrial animal production. These images are critical to getting our message across.
27. Creating a sense of uneasiness and discomfort with the status quo is crucial for driving change and morally advancing as a society. In fact, that's the only thing that has ever helped any society to morally advance. It is only by showing footage of what happens behind closed doors that people see the urgency of the situation. Showing people the uncomfortable truth is the most powerful and essential educational tool at my disposal to

inspire individuals to take action for a kinder and more compassionate world. As such, our method would not be effective without the silent footage we show on the TVs.

28. I have taught a food transformation course at Harvard and am a guest speaker on various topics like food policy, advancements in food technology, cultivated meat, and high-impact charitable work. I have had the privilege of addressing audiences at institutions such as MIT, Columbia, UT Austin, Texas Tech, and more. What sets my presentations apart is my consistent inclusion of the same impactful documentary we use for our Cube of Truth events, regardless of the specific focus of the talk. The response from professors and students has been overwhelmingly positive. The documentary I share leaves a lasting impact, sparking conversations and driving change in profound ways.
29. We locate the Cube of Truth where there is high foot traffic to maximize our outreach, but we are careful to ensure that people can always move past us if they don't want to stop and engage with us.
30. I perform extensive research before I lead our group in a demonstration by researching proper areas to protest in a lawful, peaceful, and safe way.
31. Anonymous for the Voiceless has participated in public areas all over Texas including Austin, San Antonio, Houston, and Dallas.
32. During these demonstrations in Austin, San Antonio and Dallas, our group has never been told to leave a public area in the past.
33. Prior to entering Discovery Green Park, I performed research which showed me that the park is a public park. Along with Daraius Dubash, I found that Discovery Green's website characterizes the space as a public park and states that it is open to the general public. Daraius and I also independently visited the park. We both observed that Discovery Green

appears to be a public park, where the public can enter without admission or tickets, and where people gather, recreate, and attend events. We also respectively noticed a stone tablet with the Mayor's name, the City of Houston, and the Houston Downtown Park Corporation on it, strongly suggesting that the park was public. In addition, I observed a sign in the park that stated that Houston Police Department officers enforce City of Houston ordinances in the park. After being asked to leave the park in November 2021, Daraius shared with me that he also found property records showing that the land is owned by the Houston Downtown Park Corporation, making Discovery Green public property, and that Discovery Green receives public funding.

34. On April 16, 2022, during a Cube of Truth, Brian Wilmer, a park official, and Officer R. Douglas (#7943) ordered me and others in the demonstration off of the sidewalk at Discovery Green Park and claimed it is a private park. I was scared that staying in the park might risk arrest, so myself and the others in our group left Discovery Green. Neither Wilmer nor Douglas stated any park rule or city ordinance when ordering us to leave.
35. On June 18, 2022, during a Cube of Truth, Wilmer informed my group again that we needed to move to a portion of the sidewalk which Discovery Green did not own (he asserted that Discovery Green owned portions of the sidewalk). He claimed that our intended purpose was to give nightmares to children. That assertion is false. Giving nightmares to children does not serve any educational purpose and will not help reduce animal consumption because children do not pay for the groceries in their household. Wilmer did not state any park rule or city ordinance when ordering us to leave.

36. On July 23, 2022, we were peacefully participating in a Cube of Truth in Discovery Green.
Nearby, another group was setup in the park speaking with people who walked by about registering to vote.
37. On this date, park security and the park manager, Floyd Willis, approached us and told our group that we needed to leave due to the content of our message. Eventually, Floyd said that if we don't leave they will call a unit to escort us out.
38. Willis then called the police and Officer Douglas (#7943) and Officer Whitworth (#7595) arrived at the scene. The officers were in Houston police uniforms.
39. When Daraius asked the officers if this was a private park, they did not answer him but claimed they must do what the manager was telling them to do. We attempted to show the officers documents from our prior research proving that Discovery Green is a public park.
40. Daraius asked for clarification from the officers of what they were ordering him to do. I witnessed Daraius asking the officers multiple times what would happen if we didn't leave and whether we would be arrested. He acknowledged that if the police were asking him to leave, he would leave. The officers refused to answer.
41. I then witnessed the officers arrest Daraius for criminal trespassing after participating in the Cube of Truth on July 23, 2022. I took video of the day's interactions, and those videos are attached as exhibits. *See* Ex. 1, Video 4 of July 23, 2022; Ex. 2, Video 5 of July 23, 2022; Ex. 3, Video 10 of July 23, 2022. I also witnessed Daraius calmly, respectfully, and repeatedly, and without resisting, ask why he was getting arrested, and Officer Douglas (#7943) refused to respond.
42. After the arrest, I approached Officer Whitworth (#7595) to clarify why Daraius was arrested. He said that it was his understanding that it's a private park, not funded by the

city and not funded by the state, despite the evidence we had tried to show him earlier stating that Discovery Green is a public park.

43. After Daraius's arrest, I interviewed and recorded another person who witnessed the arrest, and he said that we were protesting peacefully and that he didn't understand why Daraius was arrested. Because of Daraius's arrest, I worry that any one of our volunteers, myself included, might be arrested if we hold another Cube of Truth in Discovery Green.
44. In Iran, the government often says, "You are free to say whatever you want to say; just not these things..." My experience at Discovery Green was the first time I experienced something similar happen in a public setting in the US.
45. I am very thankful for the constitutional freedoms that the United States fosters, and I cherish the First Amendment principles that this country holds.
46. My name is occasionally misspelled in government documents and databases as Faraz Mohammadrezaharsini, due to a clerical error.
47. I declare under penalty of perjury that the foregoing is true and correct.

Dated: _____ 19 Oct 2023 _____



Dr. Faraz Harsini

EXHIBIT H-1

(Physical Copy Will Be Filed with the Court)

Video 4

Video Footage of Discovery Green Park Security Floyd – 1st Contact
(Part 1/2)

Date: July 23, 2022

Duration: 0:08:16

EXHIBIT H-2

(Physical Copy Will Be Filed with the Court)

Video 5:

Video Footage of Discovery Green Park Security Floyd – 1st Contact
(Part 2/2)

Date: July 23, 2022

Duration: 0:04:18

EXHIBIT H-3

(Physical Copy Will Be Filed with the Court)

Video 10

Video Footage of Plaintiff Daraius Dubash Arrest (iPhone)

Date: July 23, 2022

Duration: 0:19:15